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February 20, 1993

Federal Communications Commission
Washington, D. C. 20554

Re: FCC Notice of Proposed Rulemaking
Part 88 "Spectrum Refarming"

FEB 24 1993

FCC NOTICE

Spectrum Refarming initially comes across as a great idea to make more efficient use of the available radio spectrum and who could object to this. However, as one considers the impact of "Refarming" one finds that:

1. Most radios in use today (numbered in the millions) will be obsoleted resulting in an unnecessary expense burden for those now reasonably well-served by the present system.

2. The present community repeater operators which generally fall in the small-business category will likely find it difficult, if not impossible, to compete against the giant nationwide multi-system operators. Thus the small business operator is unnecessarily placed in a disadvantaged position.

3. You have the chance now to introduce new technologies in the 220MHz and 900MHz bands. If these prove to be so technically superior, then obsolescence of equipment will allow these new technologies to be gradually introduced and the "refarming" will take place as a natural evolution.

4. With HDTV on the horizon it is likely that many additional frequencies will be available for "state of the art" communication applications as the present lower TV channels become available for other usage.

It does not appear that "spectrum refarming" at this point is a reasonable thing to do however noble it's intended purpose may be.

Sincerely, _____